

Exhibit C

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October 23, 2023

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Re: Seizure of Electronic Devices - Mr. Alberto Matta

Dear Ms. Berger and Mr. Arvelo:

We write on behalf of our client, Mr. Alberto Matta, whose cellphone and laptop DHS seized on October 7, 2023. On October 13, 2023, we emailed (copy attached) SA Thomas Wilbert, who is listed at the point of contact in the DHS receipt for these materials, to request a phone conversation concerning the matter. Rather than arrange a phone call, SA Wilbert responded by email that Mr. Matta's cellphone would be returned on October 16, 2023, but that the laptop would continue to be detained. We again requested a phone call with SA Wilbert or with any attorney or prosecutor involved but did not receive any response. On October 17, 2023, we emailed SA Wilbert a letter (copy attached) requesting a phone call and outlining our concerns, but we have not received any response. We have also contacted senior leadership at

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the Office of the United States Attorney for the Eastern District of New York, and they have advised that to their knowledge no member of that Office is involved in this matter. We have received no response to the questions and concerns set forth in our October 17 letter; meanwhile, DHS continues to detain Mr. Matta's laptop.

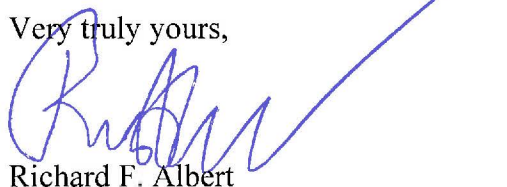
We have sought a conversation because we are concerned that Mr. Matta's rights have been and continue to be violated by the seizure, detention, and search of his electronic devices. We reiterate our request that you advise us whether DHS has made a copy of any information contained in the cellphone or the laptop; whether it has searched or otherwise reviewed the contents of either device or intends to do so in the future; and what the legal basis is for the detention, and for any current or planned copying or search or other inspection of the contents of the devices.

We are aware of no basis for the seizure and search of the contents of these devices. We reiterate our request for the opportunity, in advance of any search (or any further search), to address any evidence DHS may have received suggesting otherwise. We request the immediate return of the contents of the devices and all copies thereof, in addition to the physical devices themselves. We also request copies of any warrant or other documents that you may contend provide legal authorization for the seizure and any search.

We reconfirm our notice that the seized materials contain sensitive business information, including extensive communications and other information protected by the attorney-client privilege and work-product doctrine. Mr. Matta and his employer, Optimum Asset Management, S.A., fully assert those protections and all other privileges that apply to the contents of the seized materials.

We request a phone conversation with you or any prosecutor or other attorney involved in this matter who can address our concerns. If we do not hear back from you by the close of business on Wednesday October 25, we shall be required to take such steps as are appropriate to protect Mr. Matta's rights.

Very truly yours,



Richard F. Albert

cc: AUSA Whitman Knapp, EDNY (by email)
Special Agent Thomas Wilbert, HIS (by email)
Enclosures